

Department Number  
C8020  
Northwest Airlines, Inc.  
7500 Airline Drive  
Minneapolis, MN 55450

DEPT. OF TRANSPORTATION  
DOCKETS

NOV 28 A 9:00



U.S. Dept. of Transportation  
Docket Operations, M-30  
West Bldg Ground Floor, Rm W12-140  
1200 New Jersey Ave. SE  
Washington, DC 20590

November 25, 2008

Via Facsimile: (202) 493-2251

**Subject: NPRM FAA-2008-1131, Directorate Identifier 2008-NE-37-AD**

References: (A) Pratt & Whitney SB PW2000 A72-734, dated November 3, 2008

To Whom It May Concern:

The subject NPRM proposes an AD for PW2000 engines because of an uncontained failure of a 2<sup>nd</sup> Stage HPT Hub. The AD would require a special optical comparator inspection (OCI) of each hub at the next HPT overhaul per the reference (A) SB.

We would like clarification of the special optical comparator inspection (OCI). It is unclear whether the task is a one-time inspection or if it is a repetitive inspection. Paragraph (e) of the NRPM states to perform this "at the next HPT overhaul, unless the actions have already been done". This statement implies a one-time inspection. However, AD's typically have very clear statements indicating what qualifies as a terminating action, or if no terminating action exists, that it is an on-going repetitive requirement. We request that a specific statement be added to the NPRM clarifying this intent.

In addition, we are concerned about the proposed 72 hour reporting requirement for the inspection results. With just one source worldwide capable of performing the special optical comparator inspection (OCI), and the disk travel time between the source and the various engine shops, the 72 hour time requirement will be extremely difficult for the operators to comply with. We request that the 72 hour requirement be eliminated, or permit or require the sole source (Pratt and Whitney), to provide the information directly to the FAA.

Respectfully,

Gregory L. Budinger  
Chief Engineer  
Northwest Airlines, Inc.

cc: D. Lee  
R. Pekarek  
G. Blake  
P. Carlson